

**From:** "Frink, Ted" <tfrink@water.ca.gov>  
**To:** <dcmessina@waterboards.ca.gov>  
**Date:** 9/22/2006 3:36:30 PM  
**Subject:** Re: University of California, Center for Aquatic Biology and Aquaculture NPDES permit

Hello Diana,

I just left a voice message on your phone in regards to questions and comments that I have on the permit requirements for UCD CABA water quality. I would like to talk with you briefly about the permit requirements listed in the proposed permit if you could return my call or email.

I have some background and understanding of the research and work that goes on at the CABA facility at UCD. I have managed research contracts with the CABA researchers and am always impressed with their management of the facilities. Given the size and role of the UCD research facility, I have questions regarding the level of WQ monitoring effort identified in the proposed permit given the type of facility and the relative amount and handling of the discharges from the facility. The CABA facilities are not hatchery level production facilities that produce fish in extremely large volumes. In fact the work conducted at the facilities is linked to management questions of water quality and environmental impacts to aquatic organisms and ecosystem functions. I understand the concerns over monitoring human and environmental health impacts for all discharges from point sources, but the level of concern and required monitoring for a facility such as this seems overly burdensome. In this case, the level of monitoring required for groundwater impacts assessment added to the surface water monitoring and analyses would have the effect of bankrupting and closing down the research facilities. Just the costs of developing monitoring wells, as well as conducting elaborate monitoring of ground and surface waters alone would require most of the funding that currently supports the researchers and facilities there. These facilities are relied on by State agencies in the region for their expertise in this field, and to create a situation that would put this at jeopardy makes little sense. I think it would be prudent in this situation to understand the role the facility plays in helping the State understand larger water supply and quality impacts of water management in the State, relative to the level of potential impact of discharges from the facilities to the State surface/ground waters locally. This is not to say that monitoring should not be an important part of operations of the research facilities, however, I do question the justification for such heavy monitoring requirements for a small University research facility whose very role it is to study and understand ramifications of pollutants and perturbations to aquatic environments and organisms on behalf of the public and the State.

I hope you will consider my thoughts and concerns here and consider modifying some of the monitoring requirements for CABA. I will look forward to hearing back from you at your earliest convenience.  
Regards,

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